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**UNITED STATES BANKRUPTCY COURT  
 SOUTHERN DISTRICT OF NEW YORK**

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In re:	)	Chapter 11
	)	Case No. 05-44481 (RDD)
DPH HOLDINGS CORP, <i>et al.</i> ,	)	
	)	
-----X	)	
DELPHI AUTOMOTIVE SYSTEMS, LLC,	)	
	)	
Plaintiff,	)	Adv. Pro. No. 07-02606 [RDD]
	)	
v.	)	
	)	
WILLIAMS ADVANCED MATERIALS INC.,	)	
	)	
Defendant.	)	
-----X	)	

**(I) REPLY IN RESPONSE TO REORGANIZED DEBTORS' AMENDED OMNIBUS  
 RESPONSE TO CERTAIN DEFENDANTS' SUBMISSIONS REGARDING THE  
 OCTOBER 2, 2009 SUPPLEMENTAL POSTCONFIRMATION EXTENSION OF  
 AVOIDANCE ACTION SERVICE DEADLINE MOTION AND (II) JOINDER**

Defendant, Williams Advanced Materials Inc. (n/k/a Materion Advanced Materials Technologies and Services Inc.) ("Williams"), by and through counsel, and for its reply ("Reply") in response to the *Reorganized Debtors' Amended Omnibus Response to Certain*

*Defendants' Submissions Regarding the October 2, 2009 Supplemental Postconfirmation Extension of Avoidance Action Service Deadline Motion* (the "Response") hereby incorporates by reference into this Reply and hereby joins any reply briefs to the Response, and any reply brief to the Reorganized Debtors' original Omnibus Response, filed by or on behalf of similarly situated defendants in the above-referenced bankruptcy proceedings and any associated adversary proceedings, including the *Response of Globe Motors, Inc. and Globe Motors to Reorganized Debtors' Amended Omnibus Response to Certain Defendants' Submissions Regarding the October 2, 2009 Supplemental Postconfirmation Extension of Avoidance Action Service Deadline Motion* [Docket No. 21619] and *Microchip Technology Incorporated's (I) Reply to Reorganized Debtors' Amended Omnibus Response to Certain Defendants' Submissions Regarding the October 2, 2009 Supplemental Post-Confirmation Extension of Avoidance Action Service Deadline Motion to File Amended Complaints; (II) Objection to Reorganized Debtors' Oral Request for Leave to File a Second Motion to Amend the Complaint Against Microchip Technology Incorporated; and (III) Joinder* [Docket No. 21621].<sup>1</sup>

### **CONCLUSION**

Based on the forgoing, Williams renews its request that: (i) each of the Preservation of Estate Claims Procedures Order, the Extension of Avoidance Action Service Deadline Order, the Postconfirmation Extension of Avoidance Action Service Deadline Order, and the Supplemental Postconfirmation Extension of Avoidance Action Service Deadline Order be vacated and set aside; that (ii) the Complaint against it be dismissed with prejudice for failing to state a claim upon which relief can be granted; or (iii) in the alternative, the Complaint against it be dismissed

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<sup>1</sup> Except as otherwise stated herein, all capitalized terms shall have the same meaning as set forth in the Response.

with prejudice as being time barred or barred by judicial estoppel; and (iv) for such other and further relief as this Court may deem appropriate.

Dated: October 7, 2011

Respectfully submitted,

/s/ Scott C. Matasar

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served through electronic transmission via the Court's CM/ECF system to all parties who are listed on the Court's Electronic Mail Notice List on this 7th day of October, 2011.

/s/ Scott C. Matasar

Scott C. Matasar